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15	UNITED STATES DIST	DICT COUDT
16	NORTHERN DISTRICT O	
17		
1 /	KEITH THOMAS, RICHARD HAYES, HERB	CASE NO.: 3:14-cv-01160-JST
18	SMITH, and OKLAHOMA POLICE PENSION & RETIREMENT SYSTEM,	STIPULATION AND [PROPOSED]
19	RETIREMENT STSTEM,	ORDER AMENDING PLAINTIFFS'
	Plaintiffs,	PAGE LIMIT FOR THEIR
20		OPPOSITIONS TO DEFENDANTS'
21	V.	MOTIONS TO DISMISS THE THIRD AMENDED COMPLAINT
22	MAGNACHIP SEMICONDUCTOR CORP. SANG	THAIL ABED COM EMIL
22	PARK, TAE YOUNG HWANG, MARGARET	
23	SAKAI, R. DOUGLAS NORBY, ILBOK LEE, NADER TAVAKOLI, RANDAL KLEIN,	
24	MICHAEL ELKINS, AVENUE CAPITAL	
	MANAGEMENT II, L.P., BARCLAYS CAPITAL	
25	INC., DEUTSCHE BANK SECURITIES INC.,	
26	CITIGROUP GLOBAL MARKETS INC., UBS SECURITIES LLC and NEEDHAM & COMPANY,	
27	LLC,	
<i>∠1</i>	Defendants.	
28		
	STIPULATION AND [PROPOSED] ORDER AMENDING PLAINTIFFS' PA	AGE LIMIT FOR THEIR OPPOSITION TO

DEFENDANTS' MOTIONS TO DISMISS THE THIRD AMENDED COMPLAINT

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WHEREAS, pursuant to the Court's May 7, 2015 Order Granting Defendants' Motion for Order Enlarging Time (the "May 7 Order") and the Court's June 15, 2015 Order Re Motion to Coordinate and Partially Consolidate a Related Action, Lead Plaintiff Keith Thomas and plaintiffs Richard Hayes, Herb Smith, and Oklahoma Police Pension & Retirement System ("Plaintiffs") filed the Third Amended Complaint for Violations of the Federal Securities Laws on June 26, 2015;

WHEREAS, pursuant to the May 7 Order, Defendants filed the following four motions to dismiss on July 27, 2015:

- Defendants MagnaChip Semiconductor Corp., R. Douglas Norby, and Ilbok Lee's Motion to Dismiss Plaintiffs' Third Amended Complaint and Memorandum of Points and Authorities in Support Thereof;
- Defendants Michael Elkins, Randal Klein, and Avenue Capital Management II. L.P.'s Motion to Dismiss Plaintiffs' Third Amended Complaint and Memorandum of Points and Authorities in Support Thereof;
- Defendant Nader Tayakoli's Motion to Dismiss Plaintiffs' Third Amended Complaint and Memorandum of Points and Authorities in Support Thereof; and
- Underwriter Defendants' Motion to Dismiss the Third Amended Complaint and Memorandum of Points and Authorities in Support Thereof

WHEREAS, pursuant to the Court's May 7 Order, Plaintiffs' opposition briefs must be filed by September 25, 2015;

WHEREAS, pursuant to Local Civil Rule 7-3(a), Plaintiffs are permitted to file an opposition brief of 25 pages to each of Defendants' four motions for a total of 100 pages;

NOW, THEREFORE, it is hereby stipulated and agreed by the undersigned counsel as follows:

STIPULATION AND [PROPOSED] ORDER AMENDING PLAINTIFFS' PAGE LIMIT FOR THEIR OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS THE THIRD AMENDED COMPLAINT

1	1. In lieu of filing four opposition briefs, Plaintiffs may file two briefs not to exceed	
2	a total of seventy (70) pages.	
3		
4	Dated: September 21, 2015	
5	DOMED ANGELL D	
6	POMERANTZ LLP	
7	<u>/s/ Michael J. Wernke</u> Marc I. Gross	
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28	STIPULATION AND [PROPOSED] ORDER AMENDING PLAINTIFFS' PAGE LIMIT FOR THEIR OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS THE THIRD AMENDED COMPLAINT	

Case 3:14-cv-01160-JST Document 136 Filed 09/21/15 Page 4 of 8 Sunny S. Sarkis (CSB# 258073) Post Montgomery Center One Montgomery Street, Suite 1800 San Francisco, CA 94104 Telephone: (415) 288-4545 Facsimile: (415)288-4534 dennish@rgrdlaw.com ssarkis@rgrdlaw.com Counsel for Plaintiff Oklahoma Police Pension & Retirement System STIPULATION AND [PROPOSED] ORDER AMENDING PLAINTIFFS' PAGE LIMIT FOR THEIR OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS THE THIRD AMENDED COMPLAINT - 4 -

1	I, Michael J. Wernke, am the ECF User whose ID and password are being used to file this		
2	STIPULATION AND [PROPOSED] ORDER AMENDING PLAINTIFFS' PAGE LIMIT FOR		
3	THEIR OPPOSITIONS TO DEFENDANTS' MOTIONS TO DISMISS. In compliance with Civil		
4	L.R. 5-1(i)(3), I hereby attest that the signatories below have concurred in this filing.		
5	2.11. 5 1(v)(5), 1 hereby divest that the signatures below have concurred in this fitting.		
	DATED, Contombox 21, 2015		
6	DATED: September 21, 2015		
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28	STIPULATION AND [PROPOSED] ORDER AMENDING PLAINTIFFS' PAGE LIMIT FOR THEIR OPPOSITION TO		
	DEEENDANTS' MOTIONS TO DISMISS THE THIRD AMENDED COMBLAINT		

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Case 3:14-cv-01160-JST Document 136 Filed 09/21/15 Page 7 of 8 Randal Klein and Avenue Capital 1 Management II, L.P. 2 KASOWITZ, BENSON, TORRES 3 & FRIEDMAN LLP By: /s/ Daniel J. Fetterman 4 Daniel J. Fetterman* Trevor J. Welch* 5 Jason S. Takenouchi Brian S. Choi* 6 1633 Broadway New York, NY 10019 7 Telephone: (212) 506-1700 8 Fax: (212): 506-1800 dfetterman@kasowitz.com 9 Attorneys for Defendant Nader Tavakoli *Admitted pro hac vice 10 11 LATHAM & WATKINS LLP By: /s/ Patrick E. Gibbs 12 Patrick E. Gibbs 140 Scott Drive 13 Menlo Park, California 94025 Telephone: +1.650.328.4600 14 Facsimile: +1.650.463.2600 15 Patrick.Gibbs@lw.com 16 -and-17 James E. Brandt* Jason C. Hegt* 18 885 Third Avenue, Suite 1000 New York, New York 10022 19 Telephone: +1.212-906-1200 Facsimile: +1.212.751-4864 20 James.Brandt@lw.com 21 Jason.Hegt@lw.com Attorney for Defendants 22 Barclays Capital Inc.; Citigroup Global Markets Inc.; Deutsche Bank Securities Inc.; 23 Needham & Company, LLC; UBS Securities LLC 24 *Admitted pro hac vice 25 26 27 28 STIPULATION AND [PROPOSED] ORDER AMENDING PLAINTIFFS' PAGE LIMIT FOR THEIR OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS THE THIRD AMENDED COMPLAINT

IT IS SO ORDERED. Dated: September 21, 2015 United States District Judge STIPULATION AND $\overline{\text{(PROPOSED)}}$ ORDER AMENDING PLAINTIFFS' PAGE LIMIT FOR THEIR OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS THE THIRD AMENDED COMPLAINT